

Appln. No.: 09/722,177  
Amendment Dated May 2, 2006  
Reply to Office Action dated February 2, 2006

### **Remarks/Arguments**

Claims 1-32 are pending in this case. Claims 1, 9, 17, and 25 are independent claims.

Claims 17-32 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicant has amended claims 17 and 25 without prejudice or disclaimer to address the Examiner's § 112, second paragraph, rejection. Applicant submits that this Amendment is supported by the Specification as originally filed, and does not introduce any new matter.

Claims 1-4, 9-12, 17-20, and 25-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Herbert (U.S. Patent No. 6,102,592), in view of Wright et al. (U.S. Patent No. 4,900,904). Further, claims 5-8, 13-16, 21-24, and 29-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Herbert, in view of Wright et al., and further in view of Windel (U.S. Patent No. 5,991,409). Applicant respectfully traverses these rejections based on the following remarks.

Claims 1 and 17 recite, among other things, a computer, an authentication unit, and a control system in operative communication with the computer, the authentication unit and a printer (having an unsecure print head and a secure print head). Further, the control system executes a transaction session between the computer and the authentication unit to generate postal or document data, and controls the unsecure and secure print heads. Claims 9 and 25 are the respective method claims and recite similar limitations.

The Examiner asserts that Herbert discloses a computer and a control system, as recited in claims 1 and 17. However, Herbert merely describes a postal meter in Fig. 5, not a computer. (Col. 4, lines 16-19). In addition, Applicant notes the Examiner's admission that Herbert fails to disclose an authentication unit. As such, and by definition, Herbert fails to

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disclose the recited control system because the recited control system is in operative communication with the authentication system, in addition to a computer and a printer.

The Examiner asserts that Wright supplies the authentication unit which is missing from Herbert. In particular, the Examiner asserts that Wright's printer MPU 41 discloses the functionality of the recited authentication unit. Applicant respectfully disagrees.

Wright's printer MPU 41 simply controls the operation of print head 42 through a handshake recognition process. On the other hand, the recited authentication unit, along with the computer and the control system, generates postal or document data during a transaction session. There is absolutely no disclosure, teaching or suggestion in Herbert or Wright, either alone or in combination, which would lead one skilled in the art to believe that Wright's printer MPU 41, either itself or in connection with any other disclosed element, generates the recited postal or document data. Further, since Wright's printer MPU 41 does not address establishing a transaction session for generating postal or document data, there is no motivation for the Examiner's asserted combination.

As a final matter, Wright also fails to disclose the control system which is missing from Herbert. Wright does not address secure and non-secure print heads. Accordingly, since the recited control system controls, among other things, a secure and a non-secure print head, Wright cannot supply this missing element.

Given the above arguments, the Examiner's rejection of independent claims 1, 9, 17, and 25, based on the combination of Herbert and Wright, cannot be supported. Claims 1, 9, 17, and 25 are, therefore, allowable. In addition, since claims 2-8 and 16 depend from claim 1, claims 10-15 depend from claim 9, claims 18-24 depend from claim 17, and claims 26-32 depend from claim 25, these dependant claims are also allowable for at least the same

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reasons as set out above with respect to independent claims 1, 9, 17, and 25. Accordingly, it is respectfully submitted that the claims of this application are now in a condition for allowance and favorable action thereon is requested.

Respectfully submitted,



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